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RF 46469 (Rev 7/90)

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EG&G ROCKY FLATS, INC.
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October 11, 1990

90-RF-6274

Robert M. Nelson, Jr. Manager DOE, RFO

HANDLING OF WASTE GENERATED DURING ENVIRONMENTAL INVESTIGATIONS

All information requested by CDH in a letter dated September 18, 1990 regarding the storage and handling of drill cuttings has been delivered. The transmittal letter which accompanied the solicited information included a review of EG&G's internal critique of the handling procedures. This critique has prompted a complete review of current procedures for the handling of investigative material generated during environmental programs at RFP

Waste handling includes all disposable materials generated during investigative activities in addition to drill cuttings and waste water. The disposition of this material during and after field activities is currently being reconsidered in reference to federal, state, and plant requirements. This review is centered around SOPs that have been delivered to CDH and EPA for review. These SOPs require the concurrence of both agencies before field work associated with the 881 Hillside Phase III RI/FS and 903 Pad Phase II RI/FS can begin.

Three waste handling issues which require the most review are the handling of drill cutting and personnel protective equipment (PPE) and the use of decontamination facilities. A flow diagram showing the path of activities associated with the handling of drill cuttings and PPE is attached.

- 1) The SOPs do not set a time for characterization of the cuttings. Characterization may require more than the 70 days proposed in the November 1989 procedure. Current turnaround time for organic samples is 90 days from time of collection to receipt in Rocky Flats Database System (RFEDS). Radiochemistry requires a longer turn around time because of the limited amount of laboratories acceptable for use.
- 2) PPE and other drilling trash will be handled consistent to the handling of cuttings generated during drilling operations at each individual borehole. PPE and other sampling trash generated during site wide water sampling activities will continue to be disposed of into the active landfill.

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3) The decon facility is used during all field investigations. Some of the equipment which is washed on the pad is used at the Landfill, Solar Evaporation Ponds, and West Spray Fields. These area are RCRA regulated Closure Units currently in interim status.

A meeting has been scheduled for October 17th with representatives from EG&G, DOE, CDH, and EPA to determine the appropriate handling of all environmental waste. The meeting will allow us to reach an acceptable agreement on all waste handling issues

If you have any questions concerning these issues please contact Randy Ogg, Remediation Projects, x7079, or Greg Litus, Environmental Monitoring and Assessment, x5971.

M Kersh, Associate General Manager Environmental Resforation & Waste Management

EG&G Rocky Flats

GWL csk

Orig and 1 cc - R. M. Nelson, Jr

Attachment: As Stated